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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 RICHARD KADREY, *et al.*,

13 Individual and Representative
14 Plaintiffs,

15 v.

16 META PLATFORMS, INC., a Delaware
corporation,

17 Defendant.
18

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
THIRD-PARTY SEALING OF SUMMARY
JUDGMENT BRIEFS**

19 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher
20 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,
21 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher
22 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (collectively, the
23 “Parties”), by and through their respective counsel, stipulate to the following:

- 24 1. On March 12, 2025, the Court entered an order directing the parties to refile each summary
25 judgment brief and any motions to seal excerpts of the brief within 5 days of the initial filing
26 deadline. Dkt. 477. That order also set an April 25, 2025 deadline for publicly refiling
27 summary judgment exhibits and motions to seal summary judgment exhibits (i.e., the Friday
28 before the summary judgment hearing). *Id.*

2. On April 7, 2025, Plaintiffs filed a combined summary judgment opposition and reply brief. Dkt. 517. Plaintiffs' brief references information over which two third parties¹ have asserted confidentiality. Those passages are located at:

- Page 28, footnote 15;
- Page 30, lines 9-10; and
- Page 30, footnote 17.

3. Plaintiffs also filed three exhibits originally produced by these third parties, and over which the third parties have asserted confidentiality:

- Plaintiffs' Exhibit 134;
- Plaintiffs' Exhibit 135; and
- Plaintiffs' Exhibit 139.

4. Plaintiffs are coordinating with the third parties regarding the sealing declaration process for these materials, as outlined in Civ. L-R 79-5(f). Those discussions are ongoing, continuing into this week.

5. To afford sufficient time for the third parties to prepare their sealing declarations, and to reduce the burden on third parties that would result from filing two separate sealing declarations for Plaintiffs' brief and Plaintiffs' exhibits, the parties stipulate as follows:

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Meta, as represented by their undersigned counsel and subject to the approval of the Court, that the third parties shall be afforded until April 25, 2025 to file a declaration in support of sealing the implicated passages of Plaintiffs' April 7 brief alongside their declaration in support of sealing the summary judgment exhibits. The implicated passages of Plaintiffs' April 7 brief have been refiled in redacted form pending submission of the third-party sealing declarations.

¹ Plaintiffs do not reference the third parties by name due to confidentiality considerations and the Court's prior sealing guidance. *See* Dkt. 498.

Dated: April 14, 2025

Respectfully Submitted,

By /s/ Matthew Brigham

By /s/ Jay Schuffenhauer

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META PLATFORMS, INC.*

PROPOSED ORDER

Pursuant to the stipulation of the Parties, **IT IS SO ORDERED.**

DATED: _____

HON. VINCE CHHABRIA
United States District Judge

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ Jay Schuffenhauer